

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

LUKE KENNA, aka "Lt.," MICHAEL  
BROWN, JR., aka "Russ," and BRIAN  
TIERNEY, aka "Wodanaz,"

Defendants.

) Criminal No. 1:23-CR-61 (BKS)  
)  
) **Indictment**  
)  
) Violation: 18 U.S.C. § 371 [Conspiracy  
) to Commit Bank Robbery]  
)  
)  
)  
) 1 Count  
)  
) County of Offense: Fulton

**THE GRAND JURY CHARGES:**

**COUNT 1**

**[Conspiracy to Commit Bank Robbery]**

From on or about November 14, 2022 through on or about November 27, 2022, in Fulton County in the Northern District of New York, and elsewhere, the defendants, **LUKE KENNA, aka "Lt.," MICHAEL J. BROWN, JR., aka "Russ," and BRIAN TIERNEY, aka "Wodanaz,"** knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed with each other to commit an offense against the United States, that is, to by force and violence, and by intimidation, take from the person and presence of another property, money, and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, to wit, Community Bank, N.A., located at 311 N. Comrie Avenue, Johnstown, New York, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing the offense, to assault and put in jeopardy the life of a person by the use of a dangerous weapon and device, in violation of Title 18, United States Code, Sections 2113(a) and (d).

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish the object of the conspiracy, the following overt acts, among others, were committed:

1. On or about November 14, 2022, **LUKE KENNA, aka “Lt.”** created a chat titled “::٩٩: Screenwriters Guild” on the messaging application Threema to plan a bank robbery.
2. On or about November 14, 2022, **MICHAEL J. BROWN, JR., aka “Russ,”** and **BRIAN TIERNEY, aka “Wodanaz,”** joined the chat.
3. On or about November 14, 2022, **LUKE KENNA, aka “Lt.”** created and sent **MICHAEL J. BROWN, JR., aka “Russ,”** a map depicting Community Bank, N.A., at 311 N. Comrie Avenue, Johnstown, New York (“Community Bank”).
4. On or about November 21, 2022, **LUKE KENNA, aka “Lt.”** conducted surveillance of and photographed Community Bank.
5. On or about November 21, 2022, **LUKE KENNA, aka “Lt.”** sent **MICHAEL J. BROWN, JR., aka “Russ,”** and **BRIAN TIERNEY, aka “Wodanaz,”** the photographs of Community Bank and photographs and video of the planned approach and escape route for the robbery of Community Bank.
6. On or about November 22, 2022, **BRIAN TIERNEY, aka “Wodanaz,”** ordered handgun parts for use in robbing Community Bank.
7. On or about November 26, 2022, **MICHAEL J. BROWN, JR., aka “Russ,”** drove from Pennsylvania to Johnstown, New York, where he met with **LUKE KENNA, aka “Lt.”** to plan the robbery of Community Bank.

8. On or about November 27, 2022, **BRIAN TIERNEY, aka “Wodanaz,”** sent **LUKE KENNA, aka “Lt.”** photographs of a handgun and a radio scanning and jamming device for use in robbing Community Bank.

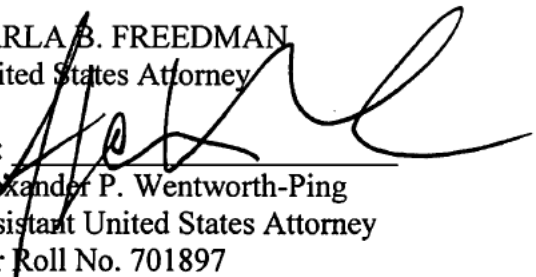
All in violation of Title 18, United States Code, Section 371.

Dated: February 14, 2023

A TRUE BILL, \*Name redaction

  
Grand Jury Foreperson

CARLA B. FREEDMAN  
United States Attorney

By:   
Alexander P. Wentworth-Ping  
Assistant United States Attorney  
Bar Roll No. 701897